

1 Lexi J. Hazam (SBN 224457)
2 lhazam@lchb.com
3 LIEFF CABRASER HEIMANN
4 & BERNSTEIN, LLP
275 Battery Street, 29th Floor
San Francisco, CA 94111-3339
Telephone: (415) 956-1000

5 Previn Warren (*pro hac vice*)
6 pwarren@motleyrice.com
7 MOTLEY RICE LLC
8 401 9th Street NW, Suite 630
Washington, DC 20004
Telephone: (202) 386-9610

9 || Plaintiffs' Co-Lead Counsel

Jennie Lee Anderson (SBN 203586)
jennie@andrusanderson.com
ANDRUS ANDERSON LLP
155 Montgomery Street, Suite 900
San Francisco, CA 94104
Telephone: (415) 986-1400

Plaintiffs' Liaison Counsel

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY
PRODUCTS LIABILITY LITIGATION

Case No. 4:22-MD-03047-YGR
MDL No. 3047

This Document Relates to:

H.F. and C.A., v. Meta, et al., 4:24-cv-08885;
SB and JC, v. Meta, et al., 4:24-cv-09400;
RN and AR, v. Meta, et al., 4:24-cv-09406;
AG and MT, v. Meta, et al., 4:24-cv-09354;
T.S. ind. & obo E.S., v. ByteDance, Ltd, et al.,
4:25-cv-00060;

21 *L.G. ind. & obo E.B., v. ByteDance, Ltd, et
al., 4:25-cv-00100;*

23 *D.M. and M.A., v. Meta, et al.*, 4:25-cv-
00118;

24 *L.G. ind. & obo K.B., v. ByteDance, Ltd, et al.*, 4:25-cv-00122;

26 | *E.W. and K.W., v. Meta, et al.*, 4:25-cv-
00161;

27 || M.S. and S.K., v. Meta, et al., 4:25-cv-00169;

28 M.C. ind. & obo A.N., v. Meta, et al., 4:25-cv-

**DECLARATION OF JENNIE LEE
ANDERSON IN SUPPORT OF
PLAINTIFFS' ADMINISTRATIVE
MOTION TO FILE UNDER SEAL
EXHIBITS TO THE DECLARATION OF
JENNIE LEE ANDERSON IN SUPPORT OF
PLAINTIFFS' THIRTEENTH
CONSOLIDATED *EX PARTE*
APPLICATION FOR APPOINTMENT OF
GUARDIANS *AD LITEM***

1 00270;
 2 *B.R. and L.R., v. Meta, et al.*, 4:25-cv-00282;
 3 *A.B. by and through her Guardian Ad Litem*
 Robert Budreau v. Meta, et al., 4:25-cv-
 4 01269;
 5 *J. C., by and through his Guardian Ad Litem,*
Kenyatta Leflore v. Meta, et al., 4:25-cv-
 6 02399;
 7 *K.H., by and through April Howell v. Snap*
Inc et. al, 4:25-cv-02985.

8 I, Jennie Lee Anderson, do hereby declare and state as follows:

9 1. I am a partner with the law firm of Andrus Anderson LLP. I am duly admitted
 10 to practice before the courts of the State of California and in the Northern District of California. I
 11 am the Court-appointed Liaison Counsel for Plaintiffs *In re Social Media Adolescent*
 12 *Addiction/Personal Injury Products Litigation*, Case No. 4:22-MD-03047, and a counsel of
 13 record for the Plaintiff in *Rodriguez v. Meta Platforms, Inc., et al.*, Case No. 4:22-cv-00401. I
 14 make this declaration of my own personal knowledge and, if called as a witness, I could and
 15 would testify competently to the matters stated below.

16 2. I make this declaration in support of Plaintiffs' Administrative Motion to File
 17 Under Seal Exhibits to the Declaration of Jennie Lee Anderson in Support of Plaintiffs'
 18 Thirteenth Consolidated *Ex Parte* Application for Appointment of Guardians *Ad Litem*
 19 ("Administrative Motion to Seal").

20 3. For the reasons set forth in Plaintiffs' administrative motion to seal filed on
 21 February 28, 2023 (ECF No. 147) and the Administrative Motion to Seal filed herewith, Plaintiffs
 22 seek to seal the Exhibits attached to the Declaration of Jennie Lee Anderson in Support of
 23 Plaintiffs' Thirteenth Consolidated *Ex Parte* Application for Appointment of Guardians *Ad Litem*
 24 ("Anderson Declaration").

25 4. True and correct copies of the following Exhibits to the Anderson Declaration
 26 are as follows and attached hereto:

- 27 • *H.F. and C.A. v. Meta, et al.*, 4:24-cv-08885 (Exhibit 1);

- 1 • *SB and JC v. Meta, et al.*, 4:24-cv-09400 (Exhibit 2);
- 2 • *RN and AR v. Meta, et al.*, 4:24-cv-09406 (Exhibit 3);
- 3 • *AG and MT v. Meta, et al.*, 4:24-cv-09354 (Exhibit 4);
- 4 • *T.S. ind. & obo E.S. v. ByteDance, Ltd, et al.*, 4:25-cv-00060 (Exhibit 5);
- 5 • *L.G. ind. & obo E.B. v. ByteDance, Ltd, et al.*, 4:25-cv-00100 (Exhibit 6);
- 6 • *D.M. and M.A. v. Meta, et al.*, 4:25-cv-00118 (Exhibit 7);
- 7 • *L.G. ind. & obo K.B. v. ByteDance, Ltd, et al.*, 4:25-cv-00122 (Exhibit 8);
- 8 • *E.W. and K.W. v. Meta, et al.*, 4:25-cv-00161 (Exhibit 9);
- 9 • *M.S. and S.K. v. Meta, et al.*, 4:25-cv-00169 (Exhibit 10);
- 10 • *M.C. ind. & obo A.N. v. Meta, et al.*, 4:25-cv-00270 (Exhibit 11);
- 11 • *B.R. and L.R. v. Meta, et al.*, 4:25-cv-00282 (Exhibit 12);
- 12 • *A.B. by and through her Guardian Ad Litem Robert Budreau v. Meta, et al.*, 4:25-cv-01269 (Exhibit 13);
- 13 • *J. C., by and through his Guardian Ad Litem, Kenyatta Leflore v. Meta, et al.* 4:25-cv-02399 (Exhibit 14); and
- 14 • *K.H., by and through April Howell v. Snap Inc et al.*, 4:25-cv-02985 (Exhibit 15).

20 5. Pursuant to Civil Local Rule 7-11, on June 15, 2023, Defendants agreed to a
21 standing stipulation that the individual applications seeking appointment of guardians *ad litem* in
22 this litigation may be filed under seal. Defendants also confirmed that, in so stipulating,
23 Defendants do not waive, and expressly reserve, their right to seek an order or orders in the future
24 to unseal individual applications and/or require parents who wish to proceed pseudonymously
25 going forward make a showing of good cause.

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1 I declare under penalty of perjury pursuant to the laws of the United States of America that
2 the foregoing is true and correct.

3 Dated: April 4, 2025

Respectfully submitted,

4 /s/Jennie Lee Anderson
5 Jennie Lee Anderson

6 ANDRUS ANDERSON LLP
7 155 Montgomery Street, Suite 900
8 San Francisco, CA 94104
Telephone: (415) 986-1400
Facsimile: (415) 986-1474
jennie@andrusanderson.com

9 *Plaintiffs' Liaison Counsel*

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